United States Department of Agriculture
Food Safety and Inspection Service
Washington, D.C. 20250

MAR 30 2005

Mr. Greg Read
Executive Manager, Exports and Food Policy
Australian Quarantine and Inspection Service (AQIS)
Edmund Barton Building
GPO Box 858
Canberra ACT 2601
Australia

Dear Mr. Read:

The Food Safety and Inspection Service conducted an on-site audit of Australia's meat inspection system June 17 through August 3, 2004. Enclosed is a copy of the final audit report. We have included your comments of January 21, 2005, as an attachment to the final report.

If you have questions regarding the audit or audit report, please contact me by telephone at 202- 720-3781, by facsimile at 202-690-4040, or by e-mail at sally.white@fsis.usda.gov.

Sincerely,

Sally White
Director
International Equivalence Staff
Office of International Affairs

Enclosure

cc: Andrew C. Burst, Counselor, American Embassy, Canberra
Dr. Andrew Cupit, Agricultural Counselor, Embassy of Australia, Washington, DC
Steve Huete, FAS Area Director
Amy Winton, State Department
Robert Macke, International Trade Policy, FAS
Barbara Masters, Acting Administrator, FSIS
Donald Smart, Director, Review Staff, FSIS
Karen Stuck, Assistant Administrator, OIA, FSIS
William James, Deputy Assistant Administrator, OIA, FSIS
Sally White, Director, IES, OIA, FSIS
Clark Danford, Director, IEPS, OIA, FSIS
Steve McDermott, IES, OIA, FSIS
Mary Stanley, Director, IID, OIA, FSIS
Armia Tawadouras, Director, Codex Programs Staff, OIA, FSIS
Linda Swacina, Executive Director – FSIA, OIA, FSIS
Country File (Australia Audit File - FY 2004)

FINAL

FINAL REPORT OF AN AUDIT CARRIED OUT IN AUSTRALIA COVERING AUSTRALIA'S MEAT INSPECTION SYSTEM

June 17 through August 3, 2004

Food Safety and Inspection Service
United States Department of Agriculture

TABLE OF CONTENTS

ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA	Central Competent Authority
AQIS	Australian Quarantine and Inspection Service
FSIS	Food Safety and Inspection Service
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point Systems
CCP	Critical Control Point
CL	Critical Limit
SSOP	Sanitation Standard Operating Procedures
E. coli	*Escherichia coli*
Salmonella	*Salmonella* species

1. INTRODUCTION

The audit took place in Australia from June 17 through August 3, 2004.

An opening meeting was held on June 17, 2004, in Canberra with the Central Competent Authority (CCA). At this meeting, the auditor confirmed the objective and scope of the audit, the auditor's itinerary, and requested additional information needed to complete the audit of Australia's meat inspection system.

The auditor was accompanied during the entire audit by representatives from the CCA, Australian Quarantine and Inspection Service and/or representatives from the regional and local inspection offices.

2. OBJECTIVE OF THE AUDIT

This audit was a routine annual audit. The objective of the audit was to evaluate the performance of the CCA with respect to controls over the slaughter and processing establishments certified by the CCA as eligible to export meat products to the United States.

In pursuit of the objective, the following sites were visited: the headquarters of the CCA, three regional inspection offices, one government residue laboratory, one private microbiology laboratory and one government microbiology laboratory performing analytical testing on United States-destined product, and 14 meat slaughter and/or processing establishments.

Competent Authority Visits			Comments
Competent Authority	Central	1	
	Regional	3	
	Autonomous Province	0	
	Local	0	Establishment level
Laboratories		3	
Meat Slaughter/Processing Establishments		11	
Meat Processing Establishments		3	
Cold Storage Facilities		0	

3. PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with CCA officials to discuss oversight programs and practices, including enforcement activities. The second part involved an audit of a selection of records in the country's inspection headquarters or regional offices. The third part involved on-site visits to 14 establishments: 11 that were conducting both slaughter and processing activities and three that were conducting processing activities only. The fourth part involved visits to one government contracted residue laboratory and one government and one private

microbiology laboratories. The Institute of Medical and Veterinary Science, Adelaide and Opus MQT, East Brunswick, VIC, were conducting analyses of field samples for the presence of generic *Escherichia coli* (*E. coli*) and *Salmonella*. The Amdel Limited, Clayton, VIC, was conducting analyses of field samples for Australia's national residue control program.

Program effectiveness determinations of Australia's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures, (2) animal disease controls, (3) slaughter/processing controls, including the implementation and operation of HACCP programs and a testing program for generic *E. coli*, (4) residue controls, and (5) enforcement controls, including a testing program for *Salmonella*. Australia's inspection system was assessed by evaluating these five risk areas.

During all on-site establishment visits, the auditor evaluated the nature, extent and degree to which findings impacted on food safety and public health. The auditor also assessed how inspection services are carried out by Australia and determined if establishment and inspection system controls were in place to ensure the production of meat products that are safe, unadulterated and properly labeled.

At the opening meeting, the auditor explained that Australia's meat inspection system would be audited against two standards: (1) FSIS regulatory requirements and (2) any equivalence determinations made for Australia. FSIS requirements include, among other things, daily inspection in all certified establishments, monthly supervisory visits to certified establishments, humane handling and slaughter of animals, ante-mortem inspection of animals and post-mortem inspection of carcasses and parts, the handling and disposal of inedible and condemned materials, sanitation of facilities and equipment, residue testing, species verification, and requirements for HACCP, SSOP, and testing for generic *E. coli* and *Salmonella*.

Equivalence determinations are those that have been made by FSIS for Australia under provisions of the Sanitary/Phytosanitary Agreement. Australia has adopted the FSIS regulatory requirement for *Salmonella* testing with the exception of the following equivalent measures:

1. Establishment employees collect samples.
2. Private laboratories analyze samples.

4. LEGAL BASIS FOR THE AUDIT

The audit was undertaken under the specific provisions of United States laws and regulations, in particular:

- The Federal Meat Inspection Act (21 U.S.C. 601 et seq.).

- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end), which include the Pathogen Reduction/HACCP regulations.

5. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on FSIS' website at the following address:
http/:www.fsis.usda.gov/Regulations_&_Policies/Foreign_Audit_Reports/index.asp

The last two audits of Australia's inspection system have shown some problems.
Of the problems identified in the FSIS audit of February/March 2002, the following had been corrected by the audit in April/June 2003:

2002

Sanitation Standard Operating Procedures

- 18 plants had non-compliances for daily records documentation of preventative measures as part of SSOP corrective actions.

- 5 incidences of non-compliances associated with implementation of SSOP's including monitoring of implementation where observed.

HACCP

- 18 observations of non-compliances for development and implementation of a written HACCP plan.

- One establishment did not adequately describe corrective actions

- One establishment did not document corrective actions

- In one establishment ingesta found after inspection non-compliance of verification

Generic *E. coli* testing

- In 11 establishments the *E. coli* procedures did not designate responsible employee and 13 establishments had no location for sample collection established.

SPS

- One establishment revealed mouse infestation in a storage building

- 3 establishments had equipment and utensils sanitary handling non-compliances.

- 3 establishments had sanitary operating procedures that could result in direct product contamination.

Implementation of HACCP is the only common deficiency noted in both the 2002 and 2003 reports.

2003

HACCP

- 8 establishments had non-compliances in development and implementation of the HACCP plan.
- Two establishments had non-compliances of HACCP monitoring.
- FSIS laboratory testing methods were not being used for residue surveillance.
- In one establishment, condemned product was not being denatured properly.
- Problems were noted with inspection controls in 10 establishments relating to enforcement of HACCP, SSOP, and sanitation performance standards.
- In one establishment, condemned product was not being denatured properly.

6. MAIN FINDINGS

6.1 Government Oversight

All inspection veterinarians and inspectors in establishments certified by Australia to export meat products to the U.S. are full-time AQIS employees, receiving no remuneration from either industry or establishment personnel.

6.1.1 CCA Control Systems

AQIS has the organizational structure and staffing to ensure uniform implementation of U.S. requirements.

6.1.2 Ultimate Control and Supervision

AOIS has the ultimate legal control over and supervision of the official activities of all employees in certified establishments.

6.1.3 Assignment of Competent, Qualified Inspectors

At the establishment level, the official veterinarians appeared to be trained but some were lacking enforcement abilities.

6.1.4 Authority and Responsibility to Enforce the Laws

Nine of 14 establishments audited had inadequate enforcement of U.S. requirements.

6.1.5 Adequate Administrative and Technical Support

AQIS has the ability to support a third-party audit.

6.2 Headquarters Audit

The auditor conducted a review of inspection system documents at headquarters, regional offices and at inspection offices in the audited establishments. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Supervisory visits to establishments that were certified to export to the United States
- Training records for inspectors and laboratory personnel.
- Label approval records such as generic labels and animal raising claims.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues.
- Sanitation, slaughter and processing inspection procedures and standards.
- Export product inspection and control including export certificates.
- Enforcement records, including examples of criminal prosecution, consumer complaints, recalls, seizure and control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

Some concerns arose as a result the examination of these documents regarding the enforcement of FSIS requirements. The concerns are further documented in this report.

6.3.1 Audit of Regional and Local Inspection Sites

The Regional Offices in Adelaide, South Australia; Sydney, New South Wales (NSW); and Perth, Western Australia were visited to discuss oversight and enforcement activities.

7. ESTABLISHMENT AUDITS

The FSIS auditor visited a total of 14 establishments. Eleven establishments were slaughter/processing establishments and three were processing only. One establishment was delisted by the AQIS because of less than daily inspection and the establishment's HACCP plan had not considered *Listeria monocytogenes* as a hazard likely to occur and had not incorporated the use of the antimicrobial agent or process to suppress or limit the growth of *Listeria monocytogenes*.

Three establishments received a Notice of Intent to Delist due to insufficient SSOP, HACCP, and *E. coli* implementation and documentation.

These establishments may retain their certification for export to the United States provided that they correct all deficiencies noted during the audit within 30 days of the date the establishment was reviewed, and corrective actions were verified by AQIS.

Specific deficiencies are noted in the attached individual establishment review forms.

8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

During laboratory audits, emphasis was placed on the application of procedures and standards that are equivalent to United States' requirements.

Residue laboratory audits focus on sample handling, sampling frequency, timely analysis data reporting, analytical methodologies, tissue matrices, equipment operation and printouts, detection levels, recovery frequency, percent recoveries, intra-laboratory check samples, and quality assurance programs, including standards books and corrective actions.

Microbiology laboratory audits focus on analyst qualifications, sample receipt, timely analysis, analytical methodologies, analytical controls, recording and reporting of results, and check samples. If private laboratories are used to test United States samples, the auditor evaluates compliance with the criteria established for the use of private laboratories under the FSIS PR/HACCP requirements.

The following laboratories were reviewed:

One government contracted residue laboratory and one government and one private microbiology laboratory were visited. The Institute of Medical and Veterinary Science, Adelaide and Opus MQT, East Brunswick, VIC, were conducting analyses of field samples for the presence of generic *Escherichia coli* (*E. coli*) and *Salmonella.* The Amdel Limited, Clayton, VIC, was conducting analyses of field samples for Australia's national residue control program. The following methods were used for detection of generic *E. coli*, *E. coli* O157:H7, and *Salmonella* species:

1. Petri film plate method used for generic *E. coli* testing.

2. Method 996.09 AOAC official method, VIP for EHEC, used for *E. coli* O157:H7

3. The method used for *Salmonella* analysis was an FSIS approved method.

The following deficiencies were noted:

- In the Institute of Medical and Veterinary Science, Adelaide, there was no knowledge of the temperature of the receiving samples.

- In the Opus MQT, East Brunswick, VIC microbiology laboratory, pages were not numbered in the Log book.

9. SANITATION CONTROLS

As stated earlier, the FSIS auditor focuses on five areas of risk to assess Australia's meat inspection system. The first of these risk areas that the FSIS auditor reviewed was Sanitation Controls.

Based on the on-site audits of establishments, and except as noted below, Australia's inspection system had controls in place for SSOP programs, all aspects of facility and equipment sanitation, the prevention of actual or potential instances of product cross-contamination, good personal hygiene practices, and good product handling and storage practices.

In addition, and except as noted below, Australia's inspection system had controls in place for water potability records, chlorination procedures, back-siphonage prevention, separation of operations, temperature control, work space, ventilation, ante-mortem facilities, welfare facilities, and outside premises.

9.1 SSOP

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the United States domestic inspection program. The SSOP in seven establishments were found to meet the basic FSIS regulatory requirements with no deficiencies.

In the other six establishments, the following deficiencies were noted:

- Implementation of SSOPs, including monitoring of implementation, was deficient in six establishments.

- Corrective action when the SSOPs have failed to prevent direct product contamination was deficient in two establishments.

- Daily records did not document the SSOP deficiency in the boning area in one establishment.

9.2 Sanitation

The following deficiencies were noted:

- In one establishment, a door connecting the shipping room with outside premises was continuously open.

- In one establishment, several rusty spots on the supportive structure and equipment were observed in the slaughter house and the boning room.

- In two establishments, there was insufficient or non-functional light at the ante-mortem suspect pen.

- In one establishment, spider webs were observed in the dressing room.

- In two establishments, cartons used for edible product were contacting the ceiling in the box storage/preparation room and plastic containers used for edible product were used for inedible purposes.

- In seven establishments, under sanitary operations category, there was a potential for direct product contamination and product was not properly protected from adulteration during processing.

- In two establishments, employees working with product or food-contact surfaces did not adhere to hygienic practices.

- In one establishment, a metal container used for inedible product was not designated as for inedible product only.

10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditor reviewed was Animal Disease Controls. These controls include ensuring adequate animal identification, humane handling and humane slaughter, control over condemned and restricted product, and procedures for sanitary handling of returned and reconditioned product. The auditor determined that Australia's inspection system had adequate controls in place with the exception of the following deficiencies:

- Non-ambulatory cattle were being slaughtered and processed in U.S. certified establishments. Although the live animals and resulting product was segregated from U.S. product, this does not meet current FSIS requirements.

- Retropharyngeal lateral (atlantal) lymph nodes were not incised in all slaughter establishments audited.

- During post-mortem inspection in two establishments, the heads were not identified with the carcasses.

There had been no outbreaks of animal diseases with public health significance since the last FSIS audit.

11. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS auditor reviewed was Slaughter/Processing Controls. The controls include the following areas: ante-mortem inspection procedures; ante-mortem disposition; post-mortem inspection procedures; post-mortem disposition; ingredients identification; control of restricted ingredients; formulations; processing schedules; equipment and records; and processing controls of cured, dried, and cooked products.

The controls also include the implementation of HACCP systems in all establishments and implementation of a generic *E. coli* testing program in slaughter establishments.

11.1 Humane Handling and Slaughter

No deficiencies were noted.

11.2 HACCP Implementation.

All establishments approved to export meat products to the United States are required to have developed and adequately implemented a HACCP program. Each of these programs was evaluated according to the criteria employed in the United States' domestic inspection program.

The HACCP programs were reviewed during the on-site audits of the 14 establishments. Eight establishments had adequately implemented the HACCP requirements. The other six establishments had the following deficiencies:

- In two establishments, direct observation of monitoring activities, and calibration of process-monitoring equipment and their frequencies were not addressed in the HACCP plan.

- In two establishments, calibration of process-monitoring equipment and the frequency of calibration were not addressed in the HACCP plan, even though the calibration of process monitoring equipment was being performed.

- In one establishment, a hazard for *Listeria monocytogenes* had not been considered in its HACCP plan and the establishment had not incorporated the use of an antimicrobial agent or process to suppress or limit the growth of *Listeria monocytogenes*.

- In one establishment, prevention of milk contamination was determined as a Critical Control Point (CCP), with a critical limit (CL), but monitoring, corrective action, and verification were not described in the HACCP plan.

- In one establishment, the HACCP plan CCP critical limit was a carcass surface temperature of 7°C in 24 hours, while a temperature of 8.8°C in 18 hours is recorded as the CL in the monitoring records. Establishment officials have not been initiating corrective action for deviations from the CL listed in the HACCP plan.

11.3 Testing for Generic *E. coli*

Australia has adopted the FSIS regulatory requirements for generic *E. coli* testing.

Eleven of the 14 establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing and were evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for generic *E. coli* was properly conducted in 10 of the 11 slaughter establishments with the following deficiencies:

- In one establishment, there was no clear understanding of the use of "m" and "M" for the generic *E. coli* testing program and no proper corrective action was taken when deviation occurs.

- In the Institute of Medical and Veterinary Science, Adelaide, laboratory employees were not recording the temperature of samples for generic *E. coli* testing at the time of receipt.

11.4 Testing for *Listeria monocytogenes*

One of the 14 establishments audited was producing ready-to-eat products for export to the United States.

- However, the HACCP plans in this establishment had not been reassessed to include *Listeria monocytogenes* as a hazard reasonably likely to occur, in accordance with FSIS requirements. The establishment had not incorporated the use of an antimicrobial agent or process to suppress or limit the growth of *Listeria monocytogenes* in its HACCP plan.

12. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS auditor reviewed was Residue Controls. These controls include sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, and corrective actions.

The Amdel Limited, Clayton, VIC, was conducting analyses of field samples for Australia's national residue control program.

No deficiencies were noted.

Australia's National Residue Testing Plan for 2004 was being followed and was on schedule.

13. ENFORCEMENT CONTROLS

The fifth of the five risk areas that the FSIS auditor reviewed was Enforcement Controls. These controls include the enforcement of inspection requirements and the testing program for *Salmonella.*

13.1 Daily Inspection in Establishments

Daily inspection was being conducted in all slaughter and processing establishments with the exception of one processing establishment.

13.2 Testing for *Salmonella*

Australia has adopted the FSIS requirements for testing for *Salmonella* with the exception of the following equivalent measure(s).

1. Establishment employees collect samples.
2. Private laboratories analyze samples.

Eleven of the 14 establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing and were evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for *Salmonella* was properly conducted in all 14 establishments.

13.3 Species Verification

Species verification was being conducted in those establishments in which it was required.

13.4 Monthly Reviews

During this audit it was found that in all establishments visited, monthly supervisory reviews of certified establishments were being performed and documented as required.

13.5 Inspection System Controls

The CCA had controls in place for ante-mortem inspection procedures and dispositions; restricted product and inspection samples; disposition of dead, dying, diseased or disabled animals; shipment security, including shipment between establishments; and prevention of commingling of product intended for export to the United States with product intended for the domestic market.

- Nine of 14 establishments audited had inadequate enforcement of some aspects of U.S. requirements.

In addition, controls were in place for the importation of only eligible livestock from other countries, i.e., only from eligible third countries and certified establishments within those countries, and the importation of only eligible meat products from other counties for further processing.

Lastly, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

14. CLOSING MEETING

A closing meeting was held on August 3, 2004, in Canberra with the CCA. At this meeting, the primary findings and conclusions from the audit were presented by the auditor.

The CCA understood and accepted the findings.

Dr. Oto Urban
International Audit Staff Officer

(Gary D. Bolstad D.V.M.
for Oto Urban D.V.M.)

15. ATTACHMENTS

Individual Foreign Establishment Audit Forms
Individual Foreign Laboratory Reports
Foreign Country Response to Draft Final Audit Report

REVIEW DATE: 08/24/04

NAME OF PEOPLE BY LABORATORY: Medvet Science: The Institute of Medical and Veterinary Science

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOVT AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
AQIS	Adelaide, South Australia	Adelaide, South Australia

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Dr. Oto Urban	Dr. John Dorian

	Residue Code/Name ▶			E.C.	SAL											
SAMPLING PROCEDURES	REVIEW ITEMS Sample Handling	ITEM # 01	EVLUATION CODE	A	A											
	Sample Frequency	02		A	A											
	Timely Analysis	03		A	A											
	Compositing Procedure	04		A	A											
	Interpret Comp Data	05		A	A											
	Data Reporting	06		A	A											
ANALYTICAL PROCEDURES	Acceptable Method	07	EVLUATION CODE	A	A											
	Correct Tissue(s)	08		A	A											
	Equipment Operation	09		A	A											
	Instrument Printouts	10		A	A											
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	EVLUATION CODE	A	A											
	Recovery Frequency	12		A	A											
	Percent Recovery	13		A	A											
	Check Sample Frequency	14		A	A											
	All Analyst W/Check Samples	15		A	A											
	Corrective Actions	16		A	A											
	International Check Samples	17		A	A											
REVIEW	Corrected Prior Deficiencies	18	EVAL. CODE	A	A											
OTHER REVIEW		19	EVAL. CODE													
		20														

Signature of reviewer: Donald C Grant for Dr Oto Urban

Date: 10/13/04

FSIS FORM 9520-4 (9/96)

Designed on: Form Flow Software

FOREIGN COUNTRY LABORATORY REVIEW (Comment Sheet)	REVIEW DATE 08/24/04	NAME OF FOREIGN LABORATORY Medvet Science The Institute of Medical and Veterinary Science
FOREIGN GOV'T AGENCY AQIS	CITY & COUNTRY Adelaide, South Australia	ADDRESS OF LABORATORY Adelaide, South Australia
NAME OF REVIEWER Dr. Oto Urban	NAME OF FOREIGN OFFICIAL Dr. John Dorian	

RESIDUE	ITEM NO.	COMMENTS
	01	There was no knowledge of the sample temperature when received from the field.

A = acceptable

REVIEW DATE 07 06 04

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOVT AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
AQIS	Clayton, Victoria	Clayton, Victoria

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Dr. Oto Urban	Dr. Roger Turner

	Residue Code/Name ▶			Benz											
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #	EVLUATION CODE												
	Sample Handling	01		A											
	Sample Frequency	02		A											
	Timely Analysis	03		A											
	Compositing Procedure	04		A											
	Interpret Comp Data	05		A											
	Data Reporting	06		A											
ANALYTICAL PROCEDURES	Acceptable Method	07	EVLUATION CODE	A											
	Correct Tissue(s)	08		A											
	Equipment Operation	09		A											
	Instrument Printouts	10		A											
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	EVLUATION CODE	A											
	Recovery Frequency	12		A											
	Percent Recovery	13		A											
	Check Sample Frequency	14		A											
	All Analyst W/Check Samples	15		A											
	Corrective Actions	16		A											
	International Check Samples	17		A											
REVIEW	Corrected Prior Deficiencies	18	EVAL. CODE	A											
OTHER REVIEW		19	EVAL. CODE	A											
		20		A											

Signature of reviewer: Donald C Trunt for Oto Urban

Date 10/12/04

FOREIGN COUNTRY LABORATORY REVIEW (Comment Sheet)	REVIEW DATE 07/07/04	NAME OF FOREIGN LABORATORY Amdel Limited
FOREIGN GOV'T AGENCY AQIS	CITY & COUNTRY Clayton, Victoria	ADDRESS OF LABORATORY Clayton, Victoria
NAME OF REVIEWER Dr. Oto Urban	NAME OF FOREIGN OFFICIAL Dr. Roger Turner	

RESIDUE	ITEM NO.	COMMENTS
		Residue code/name Benzoyl Ureas
		A = acceptable

REVIEW DATE
07.06.04

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOVT AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
AQIS	East Brunswick, Victoria	2 Alsace St, East Brunswick

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Dr. Oto Urban	Dr. Roger Turner

	Residue Code/Name ▶			E.C.	SAL											
SAMPLING PROCEDURES	REVIEW ITEMS Sample Handling	ITEM # 01	EVLUATION CODE	A	A											
	Sample Frequency	02		A	A											
	Timely Analysis	03		A	A											
	Compositing Procedure	04		A	A											
	Interpret Comp Data	05		A	A											
	Data Reporting	06		A	A											
ANALYTICAL PROCEDURES	Acceptable Method	07	EVLUATION CODE	A	A											
	Correct Tissue(s)	08		A	A											
	Equipment Operation	09		A	A											
	Instrument Printouts	10		A	A											
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	EVLUATION CODE	A	A											
	Recovery Frequency	12		A	A											
	Percent Recovery	13		A	A											
	Check Sample Frequency	14		A	A											
	All Analyst W/Check Samples	15		A	A											
	Corrective Actions	16		A	A											
	International Check Samples	17		A	A											
REVIEW	Corrected Prior Deficiencies	18	EVAL. CODE	A	A											
OTHER REVIEW		19	EVAL. CODE													
		20														

Signature of reviewer: Dr Oto Urban

Date: 10/12/04

FSIS FORM 9520-4 (9/96)

Designed on Form Flow Software

FOREIGN COUNTRY LABORATORY REVIEW (Comment Sheet)	REVIEW DATE 07/08/04	NAME OF FOREIGN LABORATORY Cous MQT
FOREIGN GOV'T AGENCY AQIS	CITY & COUNTRY East Brunswick, Victoria	ADDRESS OF LABORATORY 2 Alsace St., East Brunswick
NAME OF REVIEWER Dr. Oto Urban	NAME OF FOREIGN OFFICIAL Dr. Roger Turner	

RESIDUE	ITEM NO.	COMMENTS
	01	Pages were not numbered in the log book.

A = acceptable

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Wingham Abattoirs Pty Ltd Wingham, NSW 2429 Australia	06 - 30 - 04	154	Australia
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		X ON-SITE AUDIT ____ DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Montnly Review	
58.	
59.	

60. Observation of the Establishment

Australia, Est. 154 06-30-04

No comments were necessary.

61. NAME OF AUDITOR

Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE

Margaret A. Chaudry 10/10/04

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Pace Trading PTY. LTD Royal Park, South Australia	06 - 22 - 04	162	Australia
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	X
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling	
***Generic E. coli* Testing**	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	O
34. Species Testing	
35. Residue	O
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	X
39. Establishment Construction/Maintenance	X
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	X
46. Sanitary Operations	X
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58. NOID	X
59.	

60. Observation of the Establishment

Australia, Est. 162 06-22-04

10/51 Daily records to document monitoring, and corrective action during the pre-operation and operation sanitation did not reflect the real situation in the cryovac processing room. Additionally, daily records did not indicate any preventive action after the repeated deficiency. Establishment management will correct these deficiencies (416.16).

16/51 Direct observation of monitoring activities, calibration of process-monitoring equipment and their frequencies were not address in the HACCP plan, even though the calibration of process monitoring equipment is being performed (417.2). This deficiency is going to be corrected by the establishment management.

38 The side door to the outside was repeatedly left open by the establishment employees, despite they were directed to keep it close by the AQIS representative (416.4d).

39/51 Flaking paint was observed over the possible product way in the pre-trim room. This deficiency was scheduled for correction by the establishment management (416.3b).

45 Metal container used for inedible product was not designated as for inedible product only in the boning room. This deficiency was corrected immediately by the establishment management (416.3c).

45/51 Rusty cart, sink, and sanitizer were observed in the species testing room. This deficiency was scheduled for correction by the establishment management (416.3b).

46 An employee was observed to control condensation by wiping out the ceiling of the cooler, then contacting the drain with the wiping instrument and without sanitizing it, he continued to wipe out the ceiling. The product was located in the other end of the cooler. Corrective action was taken by the AOIS representative (416.13).

58 This establishment was issued Notice to Intend Delist (NOID) for sanitation and HACCP deficiencies.

61. NAME OF AUDITOR
Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE
10/13/04

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Tasman Group Services, Longford, Tasmania, Australia	07 – 22 – 04	195	Australia
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		X ON-SITE AUDIT ___ DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	X
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Australia, Est. 195 07-22-04

46 51 A conveyor belt used for edible product in the boning room was observed with several deep gouges, and was in need of replacement. This was scheduled for correction by the inspection service officials. [(Regulatory reference: 9 CFR 416.4 (d)].

61. NAME OF AUDITOR

Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE

Margaret H. Chaudry 10/16/04

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
John Dee Warwick P/L Warwick, Queensland, Australia	07 – 26 – 04	243	Australia
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		X ON-SITE AUDIT ___ DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
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Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	X
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Australia, Est. 243

45 Plastic containers/tubs were used in some cases for edible and inedible material. This deficiency was immediately corrected by the establishment management (416.3c).

61. NAME OF AUDITOR

Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE

Oto Urban H. Chaudry 10/14/04

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Midfield Meat International Pty. Ltd Warrnambool 3280 Victoria, Australia	07 - 07 - 04	246	Australia
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		X ON-SITE AUDIT ___ DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment:

Australia, Est. 246 07-07-04

10 Condensation had formed directly above carcasses in a cooler. An employee was observed attempting to wipe the condensation without first moving the carcasses from the affected area, causing the condensation to drip onto the carcasses. The establishment management took immediate corrective actions. (Regulatory reference: 9 CFR 416.15)

61. NAME OF AUDITOR
Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE
Dragan A. Chaudry 10/10/04

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Bolphs Meat Company Seymour Victoria, Australia	07 – 08 – 04	260	Australia
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		X ON-SITE AUDIT ___ DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	X
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	X
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	X
45. Equipment and Utensils	X
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	X
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58. NOID	X
59.	

60. Observation of the Establishment

Australia, Est. 260 07-08-04

12 Hair and grease were not properly trimmed from carcasses at the pre-trim check station and passed for boning operation. This deficiency was corrected by the inspection service representative (416.15a).

40/51 Light was not functional over the suspect pen at the ante-mortem (416.2c).

44/51 Spider webs were observed in the dressing room. This deficiency was neither recorded in the establishment sanitation records nor in the Inspection Service records (416.2h).

45/51 No sufficient number of knife sanitizers was observed in the boning room. Additionally, there was no written program for cleaning hooks used for edible product. This deficiency was scheduled for corrective action (416.13).

55/51 The heads were not clearly identified during the post-mortem inspection. This deficiency was corrected by the Inspection Service representative (310.2).

58 This establishment was issued Notice of Intent Delist for the above noted deficiencies.

61. NAME OF AUDITOR
Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE
Margaret H. Chandler 10/18/04

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
TBYS BROS Beenleigh, Queensland, Australia	07 – 27 – 04	294	Australia
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		X ON-SITE AUDIT ___ DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	X
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
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26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establisnment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	X
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Australia, Est. 294 07-27-04

15/51 Milk was determined as a CCP, with CL but monitoring, corrective action, and verification were not described. This deficiency was scheduled for correction by the establishment (417.2,c 4,5).

20/51 The HACCP's CCP2 critical limit was carcass surface temperature of 7°C in 24hrs, while temperature of 8.8°C in 18 hrs is recorded as CL in monitoring records and there is no response by taking the corrective action to the deviation. This deficiency was scheduled for corrective action by the establishment management (417.3a 1,2).

40/51 Light of sufficient intensity has to be provided to the suspect pen on the ante-mortem inspection (416.2b, 4c).

61. NAME OF AUDITOR

Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE

Dhanpat H. Chaudhry 7/29/04

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Westmeats, Pty, Ltd. Thomastown, Victoria, Australia	07 – 13 – 04	297	Australia
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		X ON-SITE AUDIT ☐ DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
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18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	O
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Australia. Est. 297 07-13-04

No comments were necessary.

61. NAME OF AUDITOR
Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE
10/12/04

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
EC Throsby Whittingham/Singlton NSW 2330 Australia	06 - 29 - 04	486	Australia
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		X ON-SITE AUDIT ___ DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Australia, Est. 486 06-29-04

No comments were necessary.

61. NAME OF AUDITOR

Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE

Maurice H. Chaudry 10/18/04

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
T&R Pty Ltd Lagoon Road Murray Bridge, South Australia	06 - 21 - 04	533	Australia
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		X ON-SITE AUDIT ___ DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	X
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	X
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Australia, Est. 533 06-21-04

16/51 Direct observations of monitoring activities were not addressed in the HACCP plan, even while it is being performed. This deficiency was scheduled for correction (9 CFR 417.2).

46/51 Several rusty spots on the supportive structure and equipment (wheelbarrow) were observed in the slaughter house and the boning room. These deficiencies were either corrected immediately or were scheduled for corrective action. (9 CFR 416.2b) and (416.3).

61. NAME OF AUDITOR
Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE
Manjeet H. Chaudry 12/12/04

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
E G Green & Sons Pty Ltd. Harvey, Western Australia	07 – 19 – 04	648	Australia
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		X ON-SITE AUDIT ___ DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	X
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Australia, Est. 648 07-19-04

10/51 A hook used for holding meat cuts during trimming was permanently attached to the boning table with a chain. The employee was observed to allow the hook and chain to fall off the table so that the hook contacted the floor. There was no handy provision for cleaning and sanitizing of the hook when this occurred. The establishment officials took corrective actions. (Regulatory reference: 9 CFR 416.14)

55/51 Heads in the post-mortem inspection area were not clearly identified. The inspection official ordered prompt corrective action. (9 CFR 310.2)

61. NAME OF AUDITOR
Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE
Margaret A - Chaudry 10/10/04

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Greenham Tasmania Pty Ltd., Smithton, Tasmania, Australia	07 – 21 – 04	716	Australia
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		X ON-SITE AUDIT ___ DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	X
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	X
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Australia. Est. 716

10 One carcass was observed to contact the floor in the cooler and one on the slaughter floor. These deficiencies were corrected immediately by the establishment management (416.14).

47 An employee assign for working with edible product was observed performing duties in the inedible product area and not washing his hands after finishing his duties. This deficiency was immediately corrected by the establishment management (416.5a).

16/51 Calibration of process-monitoring equipment and their frequencies were not addressed at the CCP2 in the HACCP plan, even though the calibration of process monitoring equipment is being performed. This deficiency was scheduled for correction by the establishment management (417.2).

61. NAME OF AUDITOR

Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE

Manager H-Chaudry 10/12/04

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
G & K. O'Connor, Pakenham, Victoria, Australia	07 – 12 – 04	1265	Australia
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		X ON-SITE AUDIT ___ DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	X
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	X
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	X
46. Sanitary Operations	
47. Employee Hygiene	X
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58. NOID	X
59.	

60. Observation of the Establishment

Australia, Est. 1265

10 Two carcasses were observed to contact the floor in two different coolers. Immediate corrective action was taken by the establishment management (416.13c).

10 The establishment employee was observed to operate equipment used for inedible and edible purpose (condensation removing device and rod for changing rails) at the same time. Immediate corrective action was performed by the establishment management (416.14).

16/51 The CCP2 did not have verification frequency and CCP3 had two unrelated critical limits (CL). These deficiencies were scheduled for correction (417.2).

29/51 There was no clear understanding of the use of m and M for the generic *E. coli* testing, and no proper corrective action was taken when deviation occurs. (310.25).

45 Cartons used for edible product were contacting the ceiling in the box storage/preparation room. Immediate corrective action was taken by the establishment management (416.3a).

45/51 Plastic container used for edible product carrying metal equipment particles was found in the workshop. Immediate corrective action was performed by the establishment officials (416.3a).

47 The establishment employee assign for working with cartons used for edible product was observed contacting the floor with his hands, not washing his hands and continue to perform his duties. Immediate corrective action was taken by the establishment officials (416.5a).

58 The Notice of Intent Delist was issued to this establishment for the SSOP, and HACCP/PR deficiencies.

61. NAME OF AUDITOR

Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE

Manzoor H. Choudry 10/10/04

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Vili's Cakes, Pies, Pasties, Sausage Rolls Mile End South, South Australia	06 - 23 - 04	1437	Australia
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		X ON-SITE AUDIT ___ DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	X
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	O
24. Labeling - Net Weights	O
25. General Labeling	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	O
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	X
34. Species Testing	O
35. Residue	O
Part E - Other Requirements	
36. Export	O
37. Import	O
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	X
50. Daily Inspection Coverage	X
51. Enforcement	X
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Montnly Review	
58. Delisted	X
59.	

60. Observation of the Establishment

Australia, Est. 1437 06-23-04

14/33/51 This establishment is producing RTE post-lethality exposed product and has failed to attempt to meet the requirements of any of the alternatives for testing for *Listeria monocytogenes*. Additionally, this establishment has not incorporated the use of the antimicrobial agent or process to suppress or limit the growth of *Listeria monocytogenes* in its HACCP plan, its SSOPs, or a prerequisite program (417.2).

49/50/51 There is no adequate government staffing and daily Inspection coverage during official operating hours at this establishment. This establishment, while approved for export to the U.S. since 1996, doesn't have any label approval and has never exported to the U.S.

58 The AQIS was asked to remove this establishment from the list of establishments approved for export to the U.S.

61. NAME OF AUDITOR
Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE
Dhanjay N. Chaudry

Australian Government
Australian Quarantine and Inspection Service

Ms Sally White
Director
International Equivalence Staff
Office of International Affairs
Food Safety and Inspection Service
Washington, D.C. 20250

Dear Ms White

Thank you for your letter of 23 November 2004 accompanying the draft final report of the Food Safety and Inspection Service (FSIS) audit of Australia's meat inspection system from 17 June through 3 August 2004. The Australian Quarantine and Inspection Service (AQIS) values FSIS's assessment of Australia's meat inspection system and will continue to implement strategies to ensure that any shortcomings are remedied. We are grateful for the observation by the US Auditor at the exit meeting on 3 August 2004 in Canberra that the implementation of HACCP in Australian export meat establishments is very good and has been improved since previous audits. We also note the US Auditor's comments at this meeting that the identified deficiencies were, on the whole, minor in nature.

The favourable comments provided by the US Auditor are supported by the audit report. We note from the report that all laboratories and ten of the fourteen slaughter and/or processing establishments reviewed during the 2004 audit were approved without the need for any significant corrective action. Of the four establishments requiring significant action, the three that received a notice of intention to delist have undertaken all required corrective action to AQIS's satisfaction and FSIS has been officially advised of the actions taken. The one establishment identified as requiring delisting during the audit had in fact been suspended by AQIS from the US market for almost eight years prior to the audit and has never exported any product to the US. Failure to communicate the suspension within the thirty-day limit was an administrative oversight. In accordance with the delisting advice received from the US Auditor, this establishment has since been removed from the list of establishments approved to export to the US. AQIS has also taken measures to rectify all minor deficiencies identified during the FSIS audit. These measures are identified in a corrective action plan, which will be provided to FSIS separately.

At the time of the 2004 audit, AQIS had only recently implemented the training program for on-plant veterinarians in response to the findings of the 2003 audit. The program will ensure that AQIS on-plant veterinarians receive consistent and comprehensive training in a range of regulatory responsibilities and AQIS considers that it will address any concerns FSIS may have regarding the enforcement abilities of AQIS on-plant veterinarians.

We note from section 6.2 of the report that some concerns arose during the headquarters audit regarding the enforcement of FSIS requirements. AQIS takes any concerns regarding the enforcement of FSIS requirements very seriously. Accordingly, AQIS has recently implemented a process of performance and competency assessment for field staff, which integrates with the training program described above. However, in relation to this component of the audit it has not been possible to assess the need for specific remedial action, as the audit report does not identify specific areas of concern. Clarification of this would assist AQIS to ensure that FSIS requirements continue to be met.

From the information contained in section 10 of the audit report we are unclear of FSIS's assessment of Australia's animal disease control measures. The report states that there are adequate controls in place, but then goes on to identify perceived deficiencies. For example, we concur that heads should be able to be correlated with carcases at post mortem examination and we have taken measures to ensure that this practice continues to be enforced. However, we have some concerns with the audit report assessment of Australian practices in relation to non-ambulatory disabled cattle and incision of atlantal lymph nodes.

Regarding the segregated slaughter and processing of non-ambulatory disabled cattle at Australian establishments authorised to export to the US, AQIS wrote to the FSIS Assistant Administrator, Ms Karen Stuck, explaining Australia's implementation of the new US measures in letters of 15 January and 20 February 2004. Following the identification of this issue by the FSIS auditor at the 3 August exit meeting, AQIS provided further clarification of Australia's system in a letter of 9 August 2004. Considering that Australia has an effective segregation system in place, there is no scientific justification to prevent the slaughter and processing of non-ambulatory disabled cattle for markets other than the US at Australian establishments authorised to export to the US.

The issue of the incision of atlantal lymph nodes was addressed by AQIS in our letter of 19 July 1994 to FSIS International Programs Director, Dr Larry Skinner. We would be grateful for confirmation from FSIS of the continued acceptability of Australia's long established practices with regard to the examination of atlantal lymph nodes.

In conclusion, I would like to thank you for the opportunity to respond to the FSIS audit report and discuss the findings of this report during the teleconference of 14 January 2004 between AQIS and FSIS. AQIS takes the audit report findings very seriously and is confident that the recently implemented corrective measures will adequately address any FSIS concerns and ensure that Australian product exported to the US continues to meet FSIS requirements.

Yours sincerely

Greg Read
Executive Manager
Exports

21 January 2004